HOUSATONIC RIVER RESTORATION, Inc.

September 18, 2003

Alison Wolfe, MNG Center at SRA
2801 Clarendon Blvd. Suite 100
Arlington, VA 22201

GEPittsfield@sra.com

RE: Comments on the Draft Ecological Risk Assessment for the GE/Housatonic River Site—Rest of River

Dear Ms. Wolfe;

The Governing Council of Housatonic River Restoration, Inc. wishes to make the following comments pertaining to the Draft Ecological Risk Assessment for the GE/Housatonic River Site—Rest of River.

We recognize that some of our observations lie outside the scope of this particular study. But we believe them to be essential to a true understanding of the risk of PCBs to wildlife in the Housatonic River. We understand that some of our observations may go beyond a strictly scientific perspective based on available data. But we believe they speak to substantial community impact.

- The risk assessment identifies high to intermediate levels of risk to some categories of wildlife, including benthic invertebrates, amphibians, some birds and mammals, and some threatened and endangered species. The risk assessment and associated studies further bolster our longstanding concerns regarding the need for cleanup and ecological restoration in the Rest of the River. However, we do not feel confident that the risk assessment has adequately characterized the severity of risk to some categories of animals, particularly fish.

  We request that the Final Ecological Risk Assessment lower some of the thresholds for characterizing the level of risk as intermediate or high, and that where inadequate or conflicting data is available the final assessment should utilize a more precautionary approach than what is presented in the draft. For example, where studies show abnormally high levels of physical abnormalities, this should be characterized as high risk for that group of animals, not low risk based on uncertainty due to lack of data on the effects on reproduction of the local population.

- We are alarmed by various reports of damage to "critters" – deformed frogs, fish with exterior bladders, etc. The overall cumulative impacts of the full range of effects on natural communities is a serious concern that should be addressed more holistically in the final risk assessment As one delegate puts it:

  "I attended both EPA sessions held here recently to discuss the results of the river studies on the effects of PCBs on human health and on wildlife. Distressing as it is for me to contemplate the effects of PCBs on human health, it was the results of the studies of wildlife, which horrified and angered me. People do have at least some choice about avoiding some of the contacts with the PCBs in the environment, but animals and birds have no choice. It may be scientifically valid to suggest that the fish population is not at risk because there are lots of fish (even though, in one

study, half produced fish bladders outside their bodies). But had PCBs not been put into the river, no fish would be deformed in this particular way. The scientists described the damage to small animals and birds—in some cases damage so severe that there are no more of those animals left in the area, and in other cases large numbers are seriously deformed and sometimes infertile. Without the PCBs, all of these creatures would be living in and along the river in their natural, undeformed and uninjured state. What we have allowed to happen is shameful, and since these creatures cannot speak for themselves, we must speak for them and insist that those responsible be held accountable and the river be restored as nearly as possible to its pre-PCB state."

Another delegate says, "If we had human babies born with three arms and four eyes, we would not treat the situation in this way."

- High levels of physical abnormalities have a high probability of impacting survival, reproduction, and population levels of fish and other animals. Direct documentation through long-term studies of reproductive success rates should not be necessary to reach this conclusion. We request that the rating of low to intermediate risk for fish be changed to intermediate to high based on the high numbers of physical abnormalities documented.

- We are concerned by the significant impacts to amphibian communities, to mink, to eagles and osprey, and especially to benthic life, which comprises the base of the food chain and is a significant indicator of the general health of a river system. The far-reaching consequences of such impacts cannot be measured or even accurately projected, but they should be recognized.

- A thorough understanding of how PCB's affect waterfowl is a critical component to the Ecological Risk Assessment and deserves more attention. The EPA collected Waterfowl samples on the Housatonic River in the summer of 1999. The results showed PCB levels more than 200 times higher that the national tolerance level. Yet, waterfowl are largely ignored in the July 2003 Ecological Risk Assessment. The sample size is small and the samples come from the same localized area. Larger samples of birds should be tested in several downstream reaches. Studies should measure contamination levels as one moves away from the source of the PCB's. Where are the waterfowl in the Housatonic likely to migrate? How are contaminated birds impacting other environments? Waterfowl are difficult to study because they do not stay in one place and it is difficult to catch waterfowl known to be raised in the area. However, previous sampling has shown waterfowl in the Housatonic are highly contaminated. Waterfowl are likely to impact areas beyond Berkshire County and are one of the few groups of animals that is consumed by humans.

- We recognize that the western, Pittsfield branch of the Housatonic River lies outside of the scope of the consent decree. But a true picture of PCB damage and its risk to wildlife must include it. The King Street dump and Dorothy Amos Park involve sediment pools downstream. The dump has a natural bedrock restriction at Linden Street. The park is just upstream of the Tel-electric dam. Sufficient testing for PCB pollution has not been done along this branch of the river. It flows through one of the poorest sections of Pittsfield and one of the highest minority populations in Berkshire County, and thus poses additional issues of environmental justice.

- Reports of high contamination levels in backwater areas upstream of the dams are especially noteworthy. One such area, Canoe Meadows, has been particularly affected. Canoe Meadows is an important river education facility for programs that teach children of all ages about the ecology and habitat of the Housatonic River through on-the-water experiences. Mass Audubon owns and manages Canoe Meadows for purposes of natural resource conservation and education. PCB contamination and associated impacts on species and the ecology of the area directly impact on the primary purposes for which this land is owned. These impacts on the conservation and education purposes of the property should be incorporated into the risk assessment and cleanup plans. In addition to direct but as of yet unquantified effects on wildlife, PCB contamination at

this site affects the ability to impart wildlife appreciation and good stewardship to future generations

- We would like to know if impoundments other than dams have been investigated. This factor ought to be discussed.
- Shouldn't all reasonably potential hot-spots be tested so as to best identify and manage human and environmental health risk exposures in the future? For example, below is a link to a map with a target indicator on the location of a substantial sediment deposit that has accumulated since the late 1970's, when the Glendale Hydro Dam gates were shut and the upstream impoundment was filled up and slowed down.

  UTM Coordinates for this spot are approximately 18 637083E 4682541N on the Stockbridge USGS Quad.

  Upstream of this spot, the river is very rocky and shallow and was known as the Glendale Rapids before the Hydro Dam was built. The sediments in this location have accumulated in a deep cove just downstream of a very modern residence belonging to Mr. Chauncey Loomis. Mr. Bryan Olson of the EPA has been there and has seen the sediment, which now has accumulated quite a collection of driftwood on it's top. After reviewing the maps of samplings shown in the RCRA Facility Investigation Report, it does not appear that these specific sediments have been sampled. Shouldn't these sediments be sampled to make sure that there was not a hot spot here?

  http://www.topozone.com/map.asp?z=18&n=4682541&e=637083&s=25

  There is one other modern-day sediment accumulation of size in Stockbridge. UTM Coordinates for this location are approximately 18 636621E 4682231N (NAD27). Much of it has accumulated since the Glendale Dam was closed in the late 70's. It is on the west shore, where you would expect it to be, and today it supports various plants when the water level is low. It is easily seen from the Glendale Bridge. Shouldn't this sediment accumulation be sampled to make sure it also is not a "hot spot"?

  http://www.topozone.com/map.asp?z=18&n=4682231&e=636621&s=25

Thank you for your consideration.

Sincerely,

Shepley W. Evans
President

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